REMARKS

The Examiner found that claims 5, 6, 13, 14, 19, and 20 would be allowed if rewritten in independent form to include the limitations of base and intervening claims. (Second Office Action, pg. 9) In response, Applicants have rewritten allowable claims 5, 13, and 19 in independent form to include the limitations of the base claims to place these claims in condition for allowance. Claims 6, 14, and 20 are also in condition for allowance because they depend from base claims 5, 13, and 20.

The Examiner rejected pending claims 1-4, 7-12, 15-18, and 21-26 as obvious (35 U.S.C. §103) over Applicant admitted prior art in the Related Art section of the Application ("Related Art"). Applicants traverse these rejections for the following reasons.

In the previous Amendment dated December 14, 2001, Applicants explained why the cited Related Art did not teach or suggest the specific claim requirements.

In the "Response to Applicant's Remarks", the Examiner did not specifically address any of Applicants arguments, but instead stated, without providing any additional evidence, that the Examiner's findings of obviousness were appropriate. (Second Office Action, pgs. 2-3) Applicants submit that these conclusory statements to do not overcome the explained shortcomings of the cited Related Art, and that the Examiner must cite specific prior art that teaches or suggests the proposed modifications. The Manual of Patent Examination Procedure (MPEP) expressly states that in order to establish a *prima facie* case of obviousness, the "teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure." MPEP, Sec. 2142, pg. 2100-121 (8th Ed., Aug. 2001).

Applicants submit that the Examiner's finding of obviousness and proposed modification of the cited Related Art section is inappropriate for two reasons. First, no cited prior art anywhere teaches or suggests the claim requirements, nor has the Examiner cited any art that suggests the proposed modifications of the Related Art section. Second, the Related Art section teaches away from the claim requirements and modifications the Examiner proposes.

Independent claims 1, 9, and 17 require transforming data in an input table in a database in a server in communication with a client. A transform command is received from the client indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell. A copy of the input table from the database is accessed and within the server data in the accessed input table is transformed according to each rule specified in the transform command.

In rejecting claims 1, 9, and 17, the Examiner recognized that the Related Art does not suggest the claimed step of receiving from the client a transform command indicating an input data table name and at least one rule indicating at least one cell in the input table to transform and a transform operation. (Second Office Action, pg. 4) To address this shortcoming, the Examiner found that the Related Art teaches that in the prior art the data in the database is transferred from the server to the client so that the client can perform the transform and return the transformed data back to the server. (Application, pg. 3, lines 15-19) From this prior art, the Examiner concluded that it would have been obvious for a person of skill in the art to modify the Related Art with the step of receiving from the client a transform command indicating the input data table name and at least one rule as claimed. The Examiner justifies this finding on the grounds that such a modification would improve the accuracy and reliability of the transformation and provide an improved technique for transformation. (Office Action, pgs. 3-4)

Applicants firstly traverse this rejection because the Examiner has not cited any art that teaches or suggests the finding that it would have been obvious to modify the cited Related Art to have the client send a transform command indicating an input data table name and at least one rule as claimed.

Moreover, not only does the cited art nowhere suggest the proposed modification to the cited Related Art, but also the cited Related Art teaches away from the modification the Examiner proposes.

The MPEP Sec. 2145 states that references cannot be modified if the suggested modification teaches away from the claimed combination. In this case, the cited Related Art

section teaches away from the claim requirement of having the client send a transform command indicating an input data table and at least one rule to have the server perform the transformation. The Related Art section mentions that "in current implementations, the data in the database table is transferred from the database server to the client to perform the transformation operation on the data at the client. After the data is transformed at the client, the data must then be transferred to the database server to update the transformed table in the database." (Application, pg. 3, lines 15-19)

The cited Related Art teaches away from the claim requirement that the client send a transform command because the cited Related Art section mentions that the client retrieves the data and performs the transformation at the client, and then returns the transformed data back to the server. This cited Related Art is the opposite of what is claimed, because the cited Related Art has the client retrieve and transform the data, as opposed to the claim requirement that the client send a transform command to the server to cause the server to transform data in response to the client command.

Moreover, the MPEP Sec. 2143.01 states that "[i]f the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious." MPEP, at 2100-125.

Here, the Examiner's proposed modifications would change the principle of operation of the cited Related Art, which mentions that the client retrieve the data to transform at the client, and then return to the server. This proposed modification constitutes an entirely different mode or principle of operation than the claim requirement that the client send a transform command to cause the server to transform the data at the server.

Thus, Applicants submit that it would be inappropriate to modify claims 1, 9, and 17 as the Examiner proposes because no cited art teaches or suggests the proposed modification of the cited Related Art and because the cited Related Art teaches away from the claim requirement of having the server perform the transformation according to rules communicated from the client.

For all the above reasons, Applicants submit that independent claims 1, 9, and 17 are patentable over the cited art because the proposed modifications of the prior art disclosed in the Related Art are improper.

Claims 2-4, 7, and 8; 10-16, and 18-21 and 26 are patentable over the cited art because they depend from claims 1, 9, and 17, respectively, which are patentable over the cited art for the reasons discussed above. Moreover, claims 2, 4, 7, 8, 10, 12, 15, 16, 18, 21, 22, and 26 provide additional ground of patentability over the cited art.

Claims 2 and 10 depend from claims 1 and 9, respectively, and further require that the client is a client computer that communicates with the server over a network, wherein the transform command is transmitted from the client computer to the server over the network.

The Examiner cited page 3, lines 12-19 of the Related Art section as teaching the additional requirements of claims 2 and 10. (Office Action, pg. 4) Applicants traverse.

The cited page 3 of the Related Art discusses how the client accesses the data from the database and then the client performs the transformations on the data and returns the transformed data to the database server. Nowhere does the cited art teach or suggest that a client computer send a transform command to the server over the network to perform the transformations at the server as claimed. Further, as discussed above, the cited Related Art teaches away from having the client send a transform command to cause the server to transform the data at the server.

If the Examiner continues in his rejection, then Applicants request that the Examiner cite specific art that teaches the proposed modifications and explain why such modifications can be made even though the cited Related art teaches away from and alters the principle of operation of the cited Related Art technique for transforming data.

Accordingly, claims 2 and 10 provide additional grounds of patentability over the cited art.

Claims 4, 12, and 18 depend from claims 1, 9, and 17 and further require that the transform command rules specify multiple transform operations to perform on at least one cell in the accessed input table. An application of a subsequent transform operation following a previous transform operation on one cell transforms previously transformed data in the cell.

In rejecting claims 4, 12, and 18, the Examiner cited page 2, lines 12-14 and 27-28 of the Related Art. (Second Office Action, pg. 6) The cited pg. 2, lines 12-14 of the Related Art discloses that transform operations may include conversions of one type of data to another to definition of new attributes. The cited pg. 2, lines 27-28 mentions that some current techniques for transforming data include the use of an SQL clause to limit the rows extracted from the source table.

Nowhere in these cited sections of the Related Art is there any suggestion of a transform command transmitted from the client to server that includes rules specifying multiple transform operations to perform. Instead, the cited Related Art concerns transform operations in general, and not through a transform command transferred from the client to server as claimed. Further, as discussed above, the cited art, the cited Related Art teaches away from having the client send a transform command to have the server perform the transformations.

If the Examiner continues in his rejection, Applicants request that the Examiner cite specific art that teaches the proposed modifications and explain why such modifications can be made even though the cited Related Art teaches away from and alter the principle of operation of the cited Related Art technique for transforming data.

Accordingly, claims 4, 12, and 19 provide additional grounds of patentability over the cited art.

Claims 7, 15, and added claim 26 depend from claims 1, 9, and 17 and further require that the client cannot affect the execution of the transform command during the execution of the transform command, whereby the transform command executes in the server independently of the client. The Examiner cited page 3, lines 15-17 of the Related Art as teaching the additional requirements of claims 7 and 15. (Office Action, pg. 6) Applicants traverse.

The cited page 3 actually teaches away from the claim requirement that the client cannot affect the execution of the transform command during the execution of the transform because the cited page 3, lines 15-17 mentions that the client performs the transformation operation. If the client performs the transformation operation as the cited page 3 discloses, then the client would

necessarily affect the execution of the transform command, which is the opposite of what is claimed – that the client not affect the execution of the transform command.

If the Examiner continues in his rejection, Applicants request that the Examiner cite specific art that teaches the proposed modifications and explain why such modifications can be made even though they teach away from and alter the principle of operation of the cited Related Art technique for transforming data.

Accordingly, claims 7, 15, and added claim 26 provide additional grounds of patentability over the cited art.

Claims 8, 16, and 21 depend from claims 1, 9, and 17 and further require that the transform command further comprises multiple rules, wherein each rule specifies at least one column in the input table and at least one transform operation to perform on each specified column in the input table. At least two rules specify different columns in the input table and different transform operations to apply to each specified column. The Examiner cited page 3, lines 12-19 of the Related Art as teaching the additional requirements of claims 8, 16, and 21. (Office Action, pgs. 6-7) Applicants traverse.

The cited page 3, lines 12-19 of the Related Art mentions that current transform operations require that different transform application programs must be written for each table to transform and for different transform rules applied to the same table. Further, in the prior art, data in the database table is transferred from the database server to the client to transform. Nowhere does this cited section of the Related Art teach or suggest the client requirement of a transform command having multiple rules, where each rules specifies at least one column and at least one transform operation to perform.

In fact, the cited Related Art teaches away from the requirement of claims 8, 16, and 21 that a single transform command can include multiple rules providing different transform operations to perform on each specified column in the input table because the cited Related Art mentions that a separate transform application program must be written for different transform rules applied to the same table. The claims, on the other hand, require that multiple rules for

different transform operations can be included in the same transform command sent from the client to server.

If the Examiner continues in his rejection, Applicants request that the Examiner cite specific art that teaches the proposed modifications and explain why such modifications can be made even though they teach away from and alter the principle of operation of the cited Related Art technique for transforming data.

For these reasons, claims 8, 16, and 21 provide additional grounds of patentability over the cited art.

Claims 22-25 include many of the distinguishing requirements found in claims 1, 4, 6, and 8 in data structure format.

The Examiner cited the same sections cited against claim 1 in rejecting claim 22. (Second Office Action, pgs. 8-9) Applicants submit that claim 22 is patentable over the cited art for the reasons discussed with respect to claims 1. Further, claims 23, 24, and 25 provide additional grounds of patentability over the cited art for the reasons discussed with respect to claims 4, 6, and 8, respectively.

New claim 27 includes the requirements of the independent data structure claim 22 and the requirements of claims 5, 13, and 19. Further, new claim 27 substantially includes the requirements of claims 5, 13, and 19 in data structure format. Thus, claim 27 is in condition for allowance for the reasons claims 5, 13, and 19 are in condition for allowance.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-27 are patentable over the art of record. Applicants submit herewith the fee for adding a claim. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: August 20, 2002

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS

Claims 5, 13, and 19 are amended as follows:

5. (Amended) [The method of claim 1, further comprising] A method for transforming data in an input table in a database in a server in communication with a client, comprising:

receiving from the client a transform command indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell;

accessing a copy of the input table from the database; and

transforming, within the server, data in the accessed input table according to each rule specified in the transform command; and

writing the transformed input table data to the database in the server after performing all transform operations specified in the rules of the transform command against the accessed input table.

13. (Amended) [The system of claim 9, wherein the program logic further comprises] A system for transforming data, comprising:

a client process;

a server including a database and an input table in communication with the client process;

program logic implemented in the server, comprising:

(i) means for receiving from the client process a transform command indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell;

(ii) means for accessing a copy of the input table from the database; and

(iii) means for transforming data in the accessed input table according to each rule specified in the transform command; and

(iv) means for writing the transformed input table data to the database in the server after performing all transform operations specified in the rules of the transform command against the accessed input table.

19. (Amended) [The article of manufacture of claim 17, further comprising] An article of manufacture for use in transforming data in an input table in a database, the article of manufacture comprising computer usable media including at least one computer program embedded therein that causes the computer to perform:

receiving a transform command indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell;

accessing a copy of the input table from the database; and

transforming data in the accessed input table according to each rule specified in the transform command; and

writing the transformed input table data to the database after performing all transform operations specified in the rules of the transform command against the accessed input table.